

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

HP INC., a Delaware corporation; and
**HEWLETT-PACKARD DEVELOPMENT
COMPANY, L.P.**, a Texas limited
partnership,

Plaintiffs,

v.

ZTHY TECH INC., a California corporation;
batterymon16, an entity of unknown form;
ehome007, an entity of unknown form;
elecbrain15, an entity of unknown form;
Idallian, an entity of unknown form; **irelia_jt**,
an entity of unknown form; **lol-electronic**, an
entity of unknown form; **shop-siker**, an entity
of unknown form; **shunwei2014**, an entity of
unknown form; **sunflower-electronic**, an
entity of unknown form; **suntek-wireless**, an
entity of unknown form; **yolanda_dh1**, an
entity of unknown form; and **DOES 1
through 20**,

Defendants.

Case No. 1:19-cv-07210-RPK-RER

**STIPULATION FOR ORDER
RELEASING FUNDS HELD BY PAYPAL,
INC.**

Judge: Honorable Rachel P. Kovner

STIPULATION

Plaintiffs HP, INC. and HEWLETT-PACKARD DEVELOPMENT COMPANY, L.P. along with defendants elecbrain15, lol-electronic, shunwei2014, and sunflower-electronic (“Defendants;” collectively, Plaintiffs and Defendants shall be referred to as the “Parties Concerned”) hereby stipulate and agree to this request for an Order that will direct PayPal, Inc. (“PayPal”) to release to Plaintiffs’ counsel funds held in certain accounts belonging to Defendants that have been restrained by previous orders of this Court. This transfer of funds is part of the bargained for consideration that the Parties Concerned have agreed must be provided as a condition precedent to settling this matter.

This Court has issued two Orders that directed PayPal to restrain funds belonging to Defendants that are held by PayPal. *See* Temporary Restraining Order (ECF Document # [“Doc.”] 13)); Order Entering A Preliminary Injunction (Doc. 34). The Order requested by this

stipulation is necessary to liberate the funds frozen by those Court Orders.

The Parties Concerned hereby agree and request that the Court enter an Order that directs PayPal to release to Plaintiffs, through their counsel, the funds frozen in each of the Defendant's PayPal accounts in order to help give effect to the settlement; and, that will allow PayPal to reactivate Defendants' PayPal accounts, upon receiving notice from Plaintiffs' counsel, after Defendants' obligations under the settlement agreement have been fully performed. The Proposed Order, attached as Exhibit A to this Stipulation, is acceptable to the Parties Concerned.

IT IS SO STIPULATED AND AGREED:

Dated: October 1, 2020

/s/ Louis P. Feuchtbaum

Louis P. Feuchtbaum
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Counsel for Plaintiffs HP Inc. and Hewlett-Packard Development Company, L.P.

Dated: October 1, 2020

/s/ Timothy T. Wang

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Attorney for Defendants Zthy Tech, Inc. and batterymon16

DECLARATION OF CONSENT OBTAINED FROM SIGNATORIES

I, Louis P. Feuchtbaum, hereby attest and declare, subject to penalty of perjury under the laws of the United States, that Timothy T. Wang, counsel for Defendants, agreed to this stipulation and authorized me to indicate his assent by affixing his electronic signature to this document.

Dated: October 1, 2020

/s/ Louis P. Feuchtbaum

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